

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

OLES ENVELOPE, LLC, et al.,

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Plaintiffs,

*

v.

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Civil Action No. WMN 02-2017

GTD COMPANY, INC., et al.,

*

Defendants.

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* * * * *

JOINT MOTION TO EXTEND SUMMARY JUDGMENT DEADLINES

Plaintiffs, Oles Envelope, LLC and Oles Envelope Corporation ("Plaintiffs"), and Defendants, GTD Company, Inc., Harold Robinson and David Oechsle ("Defendants"), by undersigned counsel, hereby jointly move this Court to modify the summary judgment deadlines provided in the existing Scheduling Order for the following reasons:

1. Under the current Scheduling Order, the pretrial dispositive motions deadline is set for July 21, 2003. During a conference call with this Court on July 9, 2003, this Court set the trial date for March 8, 2003.

2. Defendants plan to file a motion for summary judgment, to which Plaintiffs will be required file an opposition 14 days after service of the motion under the local rules. The two key associates assigned to the case for both Plaintiffs and Defendants are pregnant. Jennifer Lazenby, co-counsel for Plaintiffs, is now out of the office under doctor's orders. Tessa Frederick, co-counsel for Defendants, will most likely have labor induced imminently. Without the assistance of these two associates, who have extensive and intimate knowledge of this case, all counsel will need additional time to prepare the dispositive motion, opposition and reply papers.

3. The parties jointly request that the deadlines for filing of motions for summary judgment, oppositions to such motions and any replies be revised as follows:

Dispositive pretrial motions deadline – August 8, 2003

Opposition deadline – September 5, 2003

Reply deadline – September 22, 2003

4. The proposed revised schedule will not impact the scheduled trial date. Counsel also intends to contact this Court's chambers to request a new trial date because it was learned after this Court issued the trial date that the two week trial in this case falls in the middle of vacation plans. Thus, if this Court will issue a new trial date, it is likely that the Court will have ample time to consider, and if it desires, to hear arguments on Defendants' motion for summary judgment and any opposition.

5. None of the parties nor the Court will be prejudiced by the proposed modification of the deadlines.

WHEREFORE, Plaintiffs and Defendants respectfully request that the Court modify the existing pretrial dispositive motions deadlines.

Dated: July 16, 2003

/s/
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